

1 MICHAEL F. BOHN, ESQ.  
Nevada Bar No.: 1641  
2 [mbohn@bohnlawfirm.com](mailto:mbohn@bohnlawfirm.com)  
NIKOLL NIKCI, ESQ.  
3 Nevada Bar No. 10699  
[nnikci@bohnlawfirm.com](mailto:nnikci@bohnlawfirm.com)  
4 LAW OFFICES OF  
MICHAEL F. BOHN, ESQ., LTD.  
5 2260 Corporate Circle, Suite 480  
Henderson, NV 89074  
6 (702) 642-3113/ (702) 642-9766 FAX  
Attorney for defendant Flying Frog  
7 Avenue Trust

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA

11 PROF-2013-S3 LEGAL TITLE TRUST, BY  
12 U.S. BANK NATIONAL ASSOCIATION, AS  
LEGAL TITLE TRUSTEE,

13 Plaintiff,

14 vs.

15 FLYING FROG AVENUE TRUST,

16 Defendant.  
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CASE NO.: 2:17-cv-01933-JCM-GWF

19 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**  
20 **(THIRD REQUEST)**

21 Defendant, Flying Frog Avenue Trust (hereinafter “Flying Frog” or “Defendant”), by and through  
22 its counsel of record, the Law Offices of Michael F. Bohn, Esq., Ltd., plaintiff, PROF-2013-S3 Legal  
23 Title Trust, by U.S. Bank National Association, as Legal Title Trustee (hereinafter “Plaintiff” or “U.S.  
24 Bank”), by and through its attorney, ROCK K. JUNG, ESQ., of the law firm of Wright, Finlay & Zak,  
25 LLP, and Defendant Red Rock Financial Services, LLC (hereinafter “RRFS”), by and through its counsel  
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**C. REASON WHY DISCOVERY HAS NOT BEEN COMPLETED**

Good cause and excusable neglect justify an extension of the deadlines at this time. Defendant, Flying Frog Avenue Trust, has requested that Plaintiff supplement its responses to their discovery requests. Plaintiff agreed to supplement the written discovery and has been working with defendant Flying Frog Avenue Trust to address its concerns. Therefore, with the hope of completing discovery without requiring court intervention, the parties are desirous to extend the dispositive motions deadline at this time.

**D. PROPOSED PRE-TRIAL DEADLINES AND DISCOVERY SCHEDULE**

EVENT	CURRENT DATE	PROPOSED DATE
Discovery Cut-Off	March 13, 2018	N/A
Motions to Amend Pleadings/Add Parties	November 6, 2017	N/A
Expert Disclosures	December 6, 2017	N/A
Rebuttal Expert Disclosures	January 5, 2018	N/A
Dispositive Motions	May 14, 2018	May 29, 2018
Joint Pre-Trial Order	June 4, 2018	June 19, 2018

**E. CURRENT TRIAL DATE**

A trial date is not currently set for this matter.

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1 **F. CONCLUSION**

2 Accordingly, for good cause shown, excusable neglect, and the joint work of the parties to  
3 conclude discovery amicably the parties respectfully request that the Court enter the accompanying order  
4 to extend the aforementioned dispositive motions deadline in this matter.

5 IT IS SO STIPULATED.

6 DATED this 10th day of May, 2018.

7 **WRIGHT, FINLAY & ZAK, LLP**

8 /s/ Rock K. Jung, Esq.  
9 EDGAR C. SMITH, ESQ.  
Nevada Bar No. 05506  
10 E-Mail: [esmith@wrightlegal.net](mailto:esmith@wrightlegal.net)  
ROCK K. JUNG, ESQ.  
11 Nevada Bar No. 10906  
E-Mail: [rjung@wrightlegal.net](mailto:rjung@wrightlegal.net)  
12 7785 W. Sahara Ave., Suite 200  
Las Vegas, Nevada 89117  
13 Attorneys for plaintiff PROF-2013-S3 Legal  
Title Trust, U.S. Bank National Association,  
14 as Legal Title Trustee

15 **KOCH & SCOW LLC**

16 /s/ Steve B. Scow, Esq.  
17 Steve B. Scow, Esq.  
Nevada Bar No. 9906  
18 E-Mail: [sscow@kochscow.com](mailto:sscow@kochscow.com)  
11500 South Eastern Avenue, Suite 210  
19 Henderson, NV 89052  
Attorneys for defendant  
20 Red Rock Financial Services

**LAW OFFICES OF MICHAEL F. BOHN, ESQ., LTD.**

/s/ Michael F. Bohn, Esq.  
MICHAEL F. BOHN, ESQ.  
Nevada Bar No. 1641  
E-Mail: [mbohn@bohnlawfirm.com](mailto:mbohn@bohnlawfirm.com)  
NIKOLL NIKCI, ESQ.  
Nevada Bar No. 10699  
E-Mail: [nnikci@bohnlawfirm.com](mailto:nnikci@bohnlawfirm.com)  
2260 Corporate Circle, Suite 480  
Henderson, NV 89074  
Attorneys for defendant Flying Frog Avenue Trust

21 **ORDER**

22 **IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

25 DATED: 5-11-2018

1 Respectfully submitted by:

2 LAW OFFICES OF  
3 MICHAEL F. BOHN, ESQ., LTD.

4 By: /s/ Michael F. Bohn, Esq.  
5 MICHAEL F. BOHN, ESQ.  
6 NIKOLL NIKCI, ESQ.  
2260 Corporate Circle, Ste. 140  
Las Vegas, NV 89074  
Attorneys for defendant Flying Frog Avenue Trust